

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF KEVIN GANNON IN SUPPORT OF PLAINTIFF’S
OPPOSITION TO DEFENDANT’S MOTION FOR PROTECTIVE ORDER**

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC (“Singular”).

2. I submit this declaration in support of Singular’s Opposition to Defendant’s Motion for Protective Order.

3. Attached as Exhibit A is a true and correct copy of Plaintiff’s Notice of Deposition to Jeffrey Dean dated July 10, 2020.

4. Attached as Exhibit B is a true and correct copy of Plaintiff’s Notice of Deposition to Jennifer Roden Wall dated July 10, 2020.

5. Attached as Exhibit C is a true and correct copy of Plaintiff’s Notice of Deposition to Obi Felten dated March 10, 2021.

6. Attached as Exhibit D is a true and correct copy of e-mail correspondence from Kevin Gannon to Matthias Kamber dated February 17, 2021.

7. Attached as Exhibit E is a true and correct copy of e-mail correspondence from Andrew Bruns to Kevin Gannon dated February 18, 2021.

8. Attached as Exhibit F is a true and correct copy of Plaintiff's Notice of Deposition to Jeffrey Dean dated March 10, 2021.

9. Attached as Exhibit G is a true and correct copy of Plaintiff's Notice of Deposition to Jennifer Wall dated March 11, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on April 9, 2021 at Boston, Massachusetts.

/s/ Kevin Gannon

Kevin Gannon